

FREEMAN, NOOTER & GINSBERG  
ATTORNEYS AT LAW

---

LOUIS M. FREEMAN  
THOMAS H. NOOTER\*  
LEE A. GINSBERG

75 MAIDEN LANE  
SUITE 503  
NEW YORK, N.Y. 10038

\*NY AND CALIF. BARS

(212) 608-0808  
TELECOPIER (212) 962-9696

May 4, 2022

Honorable Paul G. Gardephe  
United States District Judge  
Southern District of New York  
Thurgood Marshal Courthouse  
40 Foley Square  
New York, NY 10007

CONSENT LETTER MOTION

RE: United States v. Tonya Thomas (Rose, et al), 19 Cr. 789 (PGG)

Your Honor:

I am writing again to request a final two-week postponement of the sentencing hearing date (now scheduled for May 18, 2022), with the parties' sentencing submissions to be rescheduled accordingly (defense two weeks prior to the hearing, and government one week prior).

The reason for the request is that I have been very overwhelmed with work on other cases, and through a misunderstanding by my client, I have not completed the task of obtaining documents I need for my sentencing submission (which is due today). I would really like an additional two weeks for the sentence hearing until **May 31** [I am tied up with an all-day hearing with Judge Stein on June 1st and June 2nd] or any date after June 2, 2022.

I have consulted with AUSA Louis Pellegrino and he has no objection to this request.

I thank the Court in advance for Your Honor's consideration of this application.

Sincerely,

/s/ Thomas H. Nooter

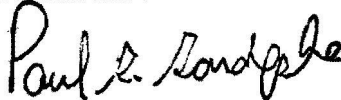
Attorney (co-counsel) for Defendant

cc: AUSAs Louis Pellegrino, Mathew Andrews, and Stephanie Simon, by ECF

**MEMO ENDORSED:**

The Defendant's sentencing, currently scheduled for May 18, 2022, is adjourned to **May 31, 2022, at 11:00 a.m.** The Defendant's submission is now due by **May 13, 2022.** The Government's submission is due by **May 20, 2022.**

SO ORDERED.



---

Paul G. Gardephe  
United States District Judge  
Dated: May 6, 2022